

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WAYNE FARMS LLC	)	Civil Action No.: 20-5191
	)	
Plaintiff,	)	Judge _____
v.	)	
	)	Magistrate Judge _____
JOHN DOE AND ,	)	
LINKEDIN CORPORATION	)	
	)	
Defendants	)	
	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff Wayne Farms Wayne Farms LLC (“Wayne Farms”) files this Motion requesting leave to file under seal: Plaintiff’s Complaint which identifies name, email and bank information for the Defendant John Doe. In this action, including, *inter alia*, allegations of trademark counterfeiting including remedies under 15 USC 1117, copyright infringement, either of which may include statutory damages, and allegations of trademark infringement, false designations of origin and state law violations, all regarding which Wayne Farms contemplates requesting temporary *ex parte* relief, which remedies and relief may be prejudiced by publication as set forth below.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief.

Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Wayne Farms will move to unseal these documents.

Respectfully submitted,

/David C Brezina/

By: David C Brezina  
One of Plaintiff's attorneys

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